

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

UNITED STATES OF AMERICA ) **INDICTMENT** *3:16CR24*  
                                 ) (Three Counts)  
                                 v. )  
                                 ) CAUSE NO.  
RICHARD MAXIE )  
                                 ) 18 U.S.C. § 922(g)(1)  
                                 ) 18 U.S.C. § 924(c)  
                                 ) 21 U.S.C. § 841(a)(1)

**THE GRAND JURY CHARGES:**

**COUNT 1**

In or around February 2016, in the Northern District of Indiana,

**RICHARD MAXIE,**

defendant herein, having been convicted of a crime punishable by  
imprisonment for a term exceeding one year, knowingly possessed in and  
affecting commerce a firearm, a Taurus, .9 mm pistol, model PT111, serial  
number TCR76031.

In violation of Title 18, United States Code, Section 922(g)(1).

THE GRAND JURY FURTHER CHARGES:

**COUNT 2**

In or around February 2016, in the Northern District of Indiana,

**RICHARD MAXIE,**

defendant herein, knowingly possessed a firearm in furtherance of drug trafficking crime(s) which may be prosecuted in a court of the United States, specifically, possession with intent to distribute a controlled substance.

In violation of Title 18, United States Code, Section 924(c).

**THE GRAND JURY FURTHER CHARGES:**

**Count 3**

In February 2016, in the Northern District of Indiana,

**RICHARD MAXIE,**

defendant herein, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

## FORFEITURE ALLEGATION

Upon conviction of any of the offenses in Counts 1 through 3 of the Indictment,

**RICHARD MAXIE,**

defendant herein, shall forfeit to the United States of America pursuant to 18 U.S.C. § 924(d) all firearms and ammunition involved in the commission of the offense, including but not limited to the following:

Further, upon conviction of any of the offenses in Counts 1 through 3 of the Indictment, defendant shall forfeit to the United States any property constituting, or derived from, any proceeds defendant obtained directly or indirectly and/or any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, violations of Title 21, United States Code, Section 841(a)(1), under Title 21, United States Code, Section 853.

A TRUE BILL:

s/Grand Jury Foreperson  
Grand Jury Foreperson

APPROVED BY:

DAVID CAPP  
UNITED STATES ATTORNEY

By: s/Jesse M. Barrett  
Jesse M. Barrett  
Assistant United States Attorney